

1  
2  
3  
4  
5  
6  
7  
8  
9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,  
13 Individual and Representative Plaintiffs,  
14 v.  
15 META PLATFORMS, INC., a Delaware  
16 corporation;  
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE  
IN SUPPORT OF ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL JOINT DISCOVERY  
LETTER BRIEF AND EXHIBITS**

1 I, Michelle Woodhouse, hereby declare:

2 1. I am Associate General Counsel for Defendant, Meta Platforms, Inc. I have personal  
3 knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and  
4 would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal  
6 the Parties' Omnibus briefing Re: Existing Written Discovery ("Joint Letter Brief"), Exhibits B and  
7 D to the Declaration of Maxwell V. Pritt ("Pritt Declaration"), and Exhibit 6 to the Joint Letter  
8 Brief. The motion seeks to have the following partially sealed or entirely sealed:

9 Document	Sealing Request
10 Joint Letter Brief	• Redacted portions
11 Exhibit B to Pritt Declaration	• Redacted portions
12 Exhibit D to Pritt Declaration ("Krein 13 Declaration")	• Redacted portions
14 Exhibit 6 to Joint Letter Brief	• Redacted Portions

15 3. Exhibit B to the Pritt Declaration and Exhibit 6 to the Joint Letter Brief consists of  
16 excerpts of Meta's responses to Plaintiffs' Interrogatories, which contain highly confidential  
17 information regarding Meta's Llama models, including highly sensitive technical information, such  
18 as the datasets used to train Meta's Llama models, which have not been publicly released. Public  
19 disclosure of this information exposes Meta to the risk of competitive harm.

20 4. The Krein Declaration contains detailed discussion of Meta's a highly sensitive,  
21 confidential source code for its Llama models. Public disclosure of the redacted information in the  
22 Krien Declaration exposes Meta to the risk of competitive harm.

23 5. The redacted portions of the Joint Letter Brief describe highly confidential  
24 information contained within these sensitive, confidential exhibits and declaration, the public  
25 disclosure of which would expose Meta to the risk of competitive harm.

26 6. Public disclosure of the information contained in the above-referenced materials  
27 exposes Meta to the risk of competitive harm by revealing Meta's non-public business strategies,  
28 technical information, and trade secret information pertaining to its generative AI offerings.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct

3 Executed in San Jose, California on this 8<sup>th</sup> day of November, 2024.

4  
5   
6 Michelle Woodhouse

310548502